

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2003-290-C

Re: Application of TSI Telecommunication )  
Network Services, Inc. for a Certificate of )  
Public Convenience and Necessity to Provide )  
Resold Private Line Services in the State of )  
South Carolina. )  
\_\_\_\_\_ )

**PETITION TO INTERVENE  
OUT OF TIME**

In response to the Commission's Notice of the Filing of the Application of TSI Telecommunications Network Services, Inc. for a Certificate of Public Convenience and Necessity to provide resold private line services in the State of South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene Out of Time in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. SCTC believes that its participation in this docket is necessary to protect the interests of its member companies and to provide the Commission with additional input on how the Application will affect the telecommunications industry.

5. SCTC did not become aware of this proceeding until late in the day on December 3, 2003. The deadline for intervention in this proceeding was November 26, 2003. Because of the SCTC's justifiable interest in this proceeding, the fact that the deadline for intervention has passed by only four (4) business days, and the fact that Applicant's testimony has not yet been filed in this proceeding, good cause exists for the Commission to allow this intervention out of time and other parties will not be prejudiced as a result of the Commission granting this request. To minimize any inconvenience to the Commission and the Applicant, SCTC's counsel is hand-delivering this Petition.

6. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
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By: /s Margaret M. Fox

Attorneys for Intervenor South Carolina  
Telephone Coalition

December 4, 2003  
Columbia, South Carolina

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**CERTIFICATE OF  
SERVICE**

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene Out of Time upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Faye A. Flowers, Esquire  
Parker, Poe, Adams & Bernstein  
1201 Main Street  
Suite 1450  
Columbia, South Carolina 29202-1509.

\_\_\_\_\_  
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December 4, 2003

Columbia, South Carolina